

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
TAIWAN
BOSTON
HOUSTON
AUSTIN
HANOI
HO CHI MINH CITY

DuaneMorris®

FIRM and AFFILIATE OFFICES

ERIC R. BRESLIN
DIRECT DIAL: +1 973 424 2063
PERSONAL FAX: +1 973 556 1552
E-MAIL: ERBreslin@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS
ALLIANCES IN MEXICO
AND SRI LANKA

January 22, 2021

VIA ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Vance Collins, No. 19-cr-00395 (PKC)

Dear Judge Castel:

Vance Collins is scheduled to be sentenced on February 10, 2021 at 11:00 AM. Due to difficulties resulting from the COVID-19 pandemic, we respectfully request that his sentencing be adjourned for 60 days.

The recent surge in virus cases has made it extremely difficult to meet with Mr. Collins, especially given his November 17, 2020 move from Metropolitan Correctional Center to the Westchester County Department of Correction, 30 miles away. The pandemic has impeded the location and collection of necessary sentencing information and prevented our having adequate time to prepare for sentencing. Further, as noted in co-defendant Ramon Ramirez's letter seeking adjournment (ECF 139), the defense objects to many aspects of the presentence report. These objections will require additional research and briefing, particularly our objection to Probation's application of U.S.S.G § 2E1.4(a)(2) (and thereby, § 2A1.5).

The government consents to this adjournment request.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Eric R. Breslin

DUANE MORRIS LLP A DELAWARE LIMITED LIABILITY PARTNERSHIP

GREGORY R. HAWORTH, RESIDENT PARTNER

ONE RIVERFRONT PLAZA, 1037 RAYMOND BLVD., SUITE 1800
NEWARK, NJ 07102-5429
DM1\10975693.1

PHONE: +1 973 424 2000 FAX: +1 973 424 2001

Duane Morris

Honorable P. Kevin Castel
January 22, 2021
Page 2

Eric R. Breslin

ERB:dc
Cc: All Counsel of Record (Via ECF)